



## **Waverley Borough Council**

# **Identifying Vulnerable People during a Major Emergency**

DRAFT

## List of Contents

Subject	Section
Foreword	1
Data Sharing and Civil Contingencies	2
Surrey Multi-Agency Information Sharing Protocol	3
Ownership and review procedure	4
Exercising	5
Actions within Waverley Borough Council	-
Plan Activation	6
Groups of vulnerable people to be identified	7
Identifying Vulnerable People	8*
How to access the vulnerable people data	9*
Reporting Mechanism	10
Confidentiality and Data Protection	11
Using the Information provided	12
Post incident	13
Note: * This version revised for data confidentiality purposes.	

## **1. Foreword**

This plan is made up of two parts.

**Part one, comprising sections 1 – 5 of this Plan**, is the Surrey Local Resilience Forum's 'Identifying Vulnerable People during a Major Emergency Plan', which describes inter-agency arrangements. In addition to this, each individual agency has outlined their own arrangements, and this forms part two of their plan.

**Part two, comprising sections 6 – 13 of this Plan**, describes the arrangements Waverley Borough Council has in place for identifying vulnerable people during an emergency. It should be read in conjunction with part one.

### **Part 1 – Surrey Local Resilience Forum**

## **2. Data Sharing and Civil Contingencies**

The Civil Contingencies Act allows the sharing of certain information for emergency planning purposes, although sensitive information – which would include personal data within the meaning of the Data Protection Act – needs to be subject to controls on the way it is handled, and the purposes to which it is put. The restrictions that need to be placed on sharing information, at planning stage, are different from those applying in an emergency.

## **3. Surrey Multi Agency Information Sharing Protocol**

The Surrey Multi Agency Information Sharing Protocol (MAISP) provides a framework for the sharing of information for organisations across Surrey. It is a generic document setting out the principles and standards under which partner organisations will share information, and underpins this plan. It is accessible on the Surrey County Council website - [Surrey Multi Agency Information Sharing Protocol](#)

## **4. Ownership and review procedure**

The owner of part two of the plan is Waverley Borough Council. The custodian is the Emergency Planning Officer, who should be notified of any amendments. The plan will be reviewed annually, with a full review every three years.

## **5. Exercising**

Part two of the plan will be exercised annually (in and out of office hours), either in conjunction with part one of the plan or independently.

## **Part 2 - Actions For Waverley Borough Council**

### **6. Plan Activation**

Sections 3 and 4 of part one of the plan identify when and how the plan will be activated. These are reproduced below, but adapted to incorporate how Waverley Borough Council will respond:

In a fast moving event, where speed is essential to protect life, the emergency services may have to take executive action without reference to others.

In a slow developing situation (for example, drought or pandemic flu), where time is available to identify the implications and plan the response, a decision will need to be made within that planning process, by relevant Category One and Two organisations, as to who will collate the information, and how.

However, there are emergencies which fit between the two categories described above (for example, impending floods or discovery of an unexploded bomb), where there is a need to identify vulnerable people, and some limited time to do so. Under these circumstances a request will be made via the Emergency Management Team (EMT) from Surrey County Council to Waverley Borough Council, through the usual channels (see part one, figure one for activation process).

### **7. Vulnerable people to be identified by Waverley Borough Council in an emergency**

- I. The following is a list of the groups of vulnerable people that Waverley has a duty of care to during an emergency.
- II. Residents registered to Careline.
- III. Housing tenants receiving Supporting People Service (sheltered housing tenants and tenants in elderly persons accommodation with community alarm).
- IV. Housing tenants with various disabilities and/or communication needs.
- V. Benefit claimants receiving specified disability benefits.
- VI. Benefit claimants with a room set aside for the needs of a disabled person or those with an exemption due to a severe mental impairment.
- VII. People registered on assisted refuse collections.

### **8. Identifying vulnerable people**

The following table outlines the sections within the Council that hold details of vulnerable people, the format the information is held in and out of hours access arrangements.

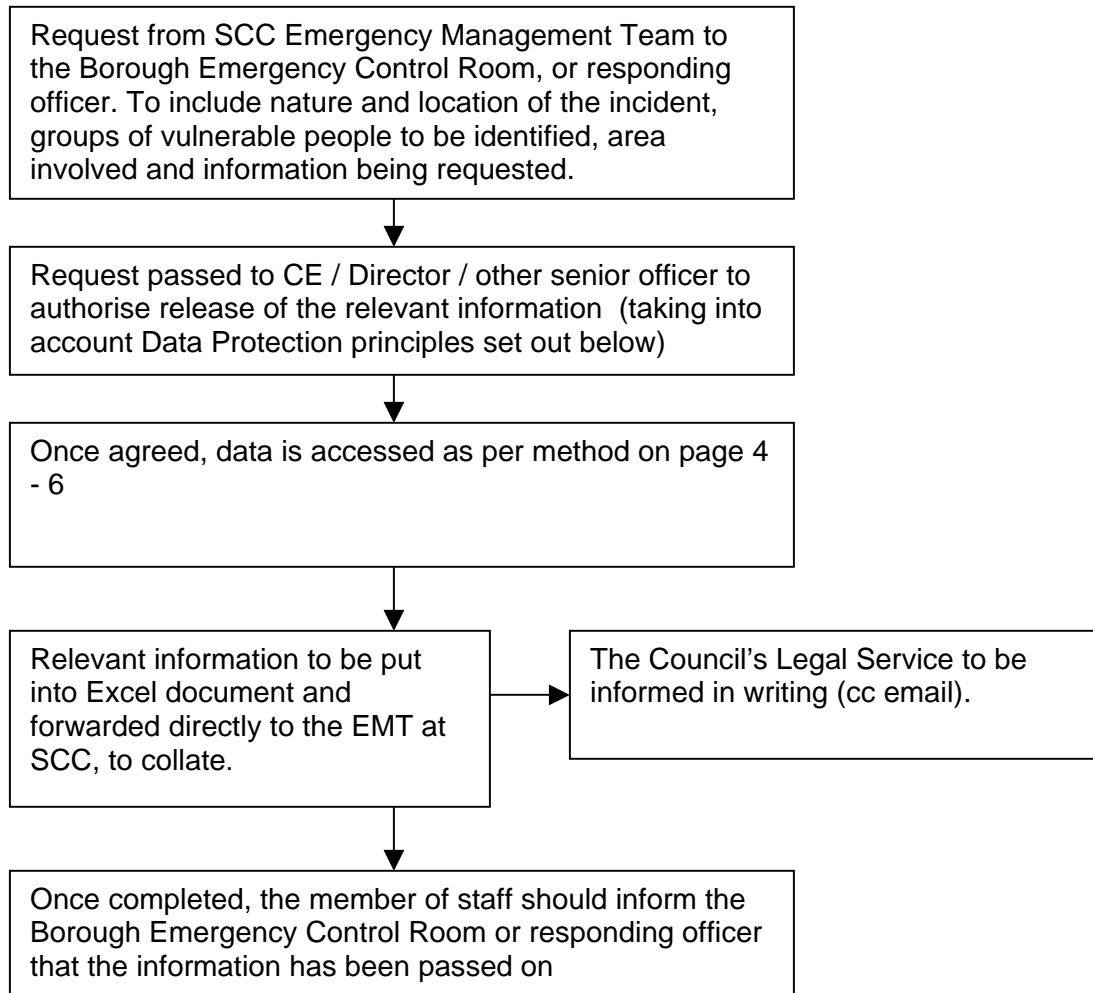
<b>Service</b>	<b>Service area</b>	<b>Accessed by</b>	<b>Method of accessing data</b>	<b>Out of hours access</b>	<b>Method of forwarding data</b>
Economic Development & Partnerships	Residents registered to Careline	Chief Executive & Directors (and PA's). HOST (and PA's). Safety & Emergency Planning Adviser (and assistant). Community Care & Partnerships Officer	Removed from this version	Removed from this version	Removed from this version
Housing 1	Tenants receiving Supported People Service i.e.  Sheltered Housing tenants 2) Tenants in elderly persons accommodation, with community alarm	Chief Executive & Directors (and PA's). HOST (and PA's). Safety & Emergency Planning Adviser (and assistant). Housing Needs Manager. Sheltered Services Manager. Tenancy and Estates Manager.	Removed from this version	Removed from this version	Removed from this version
Housing 2	List of tenants with various disabilities and/or communication needs. These may or may not receive the Supporting People service, so could appear on Housing 1 list	Chief Executive & Directors (and PA's). HOST (and PA's). Safety & Emergency Planning Adviser (and assistant). Housing Needs Manager. Sheltered Services Manager. Tenancy and Estates Manager.	Removed from this version	Removed from this version	Removed from this version

Housing benefits / council tax benefits	Claimants receiving specified disability benefits such as Attendance Allowance or carers allowance. Those who have a room set aside for the needs of a disabled person or those with an exemption due to Severe Mental Impairment.	Chief Executive & Directors (and PA's). HOST (and PA's). Safety & Emergency Planning Adviser (and assistant). Housing Needs Manager. Sheltered Services Manager. Tenancy and Estates Manager. Senior Benefits Officers. Principal Revenues Officer.	Removed from this version	Removed from this version	Removed from this version
Assisted refuse collections	Those residents who receive an assisted refuse collection service.	Chief Executive & Directors (and PA's). HOST (and PA's). Safety & Emergency Planning Adviser (and assistant). Environmental Services Manager.	Removed from this version	Removed from this version	Removed from this version

## 9. How to access the vulnerable people data

Access to this folder is restricted to those officer posts named in above table. The instructions on the page below [removed from this version] detail how to access the data and how to sort by address to eliminate double counting before submitting data

## 10. Reporting mechanism



## 11. Confidentiality and Data Protection

Officers involved in this part of the process need to understand the requirement to maintain confidentiality of information, but not where it may have an adverse effect on the ability of the emergency and other responding agencies to provide valuable support. Speedy passing of information to the responders is vital.

The Guidance provides eight key principles to consider:

- I. Data protection legislation does not prohibit the collection and sharing of personal data – it provides a framework where personal data can be used with confidence that individuals' privacy rights are respected.
- II. Emergency responders' starting point should be to consider the risks and the potential harm that may arise if they do not share information.
- III. Emergency responders should balance the potential damage to the individual (and where appropriate the public interest of keeping the information confidential) against the public interest in sharing the information.

- IV. In emergencies, the public interest consideration will generally be more significant than during day-to-day business.
- V. Always check whether the objective can still be achieved by passing less personal data
- VI. Category 1 and 2 responders should be robust in asserting their power to share personal data lawfully in emergency planning, response and recovery situations
- VII. The consent of the data subject is not always a necessary pre-condition to lawful data sharing
- VIII. Officers should seek advice where there is doubt, but should prepare on the basis that a decision may need to be made without formal advice during an emergency.

## **12. Using the Information provided**

Once the SCC EMT has collated the information it may be passed to officers of Waverley Borough Council to act on (e.g. within the Boroughs' Emergency Control Centre, Incident Liaison Officers at the scene, Rest Centre Managers). These officers should ensure that the information is shared with the tactical officers of other organisations with legitimate access, as appropriate. Information is passed on, on the understanding that these officers are responsible for ensuring that the information is stored appropriately throughout, and that it is disposed of appropriately after the incident.

## **13. Post Incident**

Should this plan be activated for an incident, it would be good practice for the Council to carry out a review of its effectiveness. This could be incorporated into the incident debrief, or independently. In addition, Waverley Borough Council will endeavour to attend any relevant inter-agency debrief.